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Presentment Date: July 3, 2023
Objection Deadline: June 26, 2023
Hearing on Objections, if any: July 18,
2023, at 3:30 p.m.

Proposed Counsel to the Debtor and Debtor-In-Possession

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 11

AJM MANAGEMENT, LLC,

Case No.: 23-41664-nhl

Debtor.

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**DEBTOR’S APPLICATION FOR LEAVE TO EMPLOY THE
LAW OFFICES OF AVRUM J. ROSEN, PLLC AS ATTORNEYS
FOR THE DEBTOR, EFFECTIVE AS OF MAY 12, 2023**

**TO: THE HONORABLE NANCY HERSHEY LORD
UNITED STATES BANKRUPTCY JUDGE**

AJM Management, LLC, the debtor and debtor-in-possession (the “Debtor”), respectfully submits this as and for its application (the “Application”), pursuant to sections 105, 327 and 328 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and the E.D.N.Y. Local Bankruptcy Rules (the “Local Rules”) for the entry of an order, substantially in the form of the proposed order annexed hereto, retaining the Law Offices of Avrum J. Rosen, PLLC (the “Firm”), as attorneys for the Debtor effective as of May 12, 2023, and respectfully represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.
2. Venue is proper in this Court pursuant to 28 U.S.C. § 1408 *et seq.*
3. The statutory predicate for the relief sought herein are sections 105, 327 and 328 of the Bankruptcy Code, Bankruptcy Rule 2014 and the Local Rules.

BACKGROUND

4. On May 12, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code.

5. The Debtor continues to operate its business and manage its property as a debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner or committee has been appointed in this case.

6. The Debtor is a New York limited liability company with its corporate office located at 2623 Foster Ave, Brooklyn, New York 11210.

7. The Debtor is a real estate investment company formed in or around January of 2004 and its business involves the purchase, ownership and management of a residential apartment building. The Debtor’s principal asset consists of the real property commonly known as 405 Rockaway Parkway, Brooklyn, New York 11212, in the Borough of Brooklyn, Block: 4672, Lot: 37 (the “Property”). The Property is improved by a four-story walk-up building (including basement) consisting of 31 residential apartments.

8. Prior to the Petition Date, the Debtor made diligent inquiry into the qualifications of the Firm, and is advised that members of the Firm are admitted to practice before this Court and by reason, ability, integrity and professional experience, are capable of providing proper legal counsel to the Debtor. The Firm has no connection with any creditor or interested party herein and represent no interest adverse to the estate or to the Debtor.

9. The Debtor is not sufficiently familiar with the rights and duties of a debtor-in-possession so as to be able to plan and conduct proceedings in Chapter 11 without the aid of competent counsel.

10. The Debtor has engaged the services of the Firm as attorneys for the Debtor and has engaged the Firm to perform services as attorneys for the debtor-in-possession subject to the approval of this Court. The Firm will advise the Debtor of the rights and duties of a debtor-in-possession, will oversee preparation of necessary reports to the courts or creditors, will conduct all appropriate investigation or litigation and will perform any other necessary duty in aid of the administration of the estate.

11. The Debtor believes that the Firm is disinterested, as that term is defined section 101(14) of the Bankruptcy Code since the Firm:

- (a) is not a creditor, equity security holder or insider;
- (b) the Debtor's shares are not publicly traded and no investment banker has been employed for the Debtor;
- (c) is not and its member has never been officers, directors or employees of the Debtor or any investment banker; and
- (d) does not have any interest materially adverse to the interest of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtor.

12. Compensation will be paid to the Firm at the customary hourly rate as counsel to the Debtor from the Debtor's estate, only upon proper application to this Court thereof. The Firm's current billing rates are as follows:

Partners:	\$670.00 per hour;
Associates:	\$395.00 - \$570.00 per hour; and
Paraprofessional:	\$150.00 - \$200.00 per hour

13. To the best of the Debtor's knowledge, the attorneys in the Firm have no connection with the Debtor, its members, or any other party in interest or their respective attorneys.

14. To the best of the Debtor's knowledge, the Firm represents no interest adverse to the Debtor or to the estate in the matter in which it is to be engaged herein, and its employment would be in the best interest of the estate.

15. The Debtor requests the Firm's retention to be effective as of the Petition Date, May 12, 2023.

NO PREVIOUS REQUEST

16. No prior motion for the relief requested herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests that the Court enter an order: (i) approving and authorizing the employment of the Firm as attorneys for the Debtor effective as of May 12, 2023; together with (ii) such other, further and different relief as this Court may deem just and proper.

Dated: May 29, 2023
Brooklyn, New York

Respectfully submitted,

By: /s/ Ray Jones
Ray Jones
Managing Director